

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

United States of America

v.

LAMARION GRAY

*Defendant(s)*

Case No. 1:23-mj-675

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 12, 2023 in the county of Hamilton in the  
Southern District of Ohio, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 1704  
18 U.S.C. 1708  
18 U.S.C. 2114(a)  
18 U.S.C. 924(c)(1)(A)(i-ii)

Theft of a Mail Key  
Theft of Mail Matter Generally  
Robbery of U.S. Property  
Use of Firearm During and in Relation to Crime of Violence

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.



*Complainant's signature*

Brad Dorman, Postal Inspector, USPIS

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

8/21/2023



*Judge's signature*

City and state:

Cincinnati, Ohio

Hon. Karen L. Litkovitz, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A COMPLAINT**  
**AGAINST LAMARION GRAY**

I, Brad Dorman, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a Complaint against LAMARION GRAY for violations of 18 U.S.C. § 1704 (theft of mail key), 18 U.S.C. § 1708 (Theft of Mail Matter Generally), 18 U.S.C. § 2114(a) (Robbery of U.S. Property with Dangerous Weapon), and 18 U.S.C. § 924(1)(A) (Use of Firearm During and in Relation to a Crime of Violence).

2. I am a United States Postal Inspector, having been so employed since August 19, 2017. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky.

3. I have gained experience through completion of the Basic Inspector Training (BIT) in November of 2017. During BIT training, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, drug and narcotics field testing, interviewing and evidence collection. Since November 2017, I have worked with various federal, state, and local law enforcement agencies in the prosecution of crimes involving the U.S. Mail and the U.S. Postal Service including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, homicides, dangerous mail investigations, and mailed narcotics.

4. This affidavit is intended to show only that there is sufficient probable cause for the requested Complaint and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

5. The United States, including the United States Postal Inspection Services (USPIS), is conducting a criminal investigation of LAMARION GRAY and others regarding possible violations of 18 U.S.C. § 1704 (theft of mail key), 18 U.S.C. § 1708 (Theft of Mail Matter Generally), 18 U.S.C. § 2114(a) (Robbery of U.S. Property with Dangerous Weapon), and 18 U.S.C. § 924()(1)(A) (Use of Firearm During and in Relation to a Crime of Violence).

**Tactics Used in Mail Theft**

6. Based on your Affiant's training and experience involving other criminal investigations of mail theft and identity theft, together with the knowledge given to me by other law enforcement personnel and other law enforcement agents, your Affiant knows:

- a. Persons use the U.S. Postal Service (USPS) to send various types of mail. First class mail is the most common type of mail sent by consumers via stamp and envelope. Some of the most common items sent in first-class mail by USPS customers are checks. As a result, criminals routinely target USPS first class mail to steal checks for the purpose of altering them and depositing them at financial institutions. Often, first-class mail is sent by USPS customers by placing an envelope with a stamp into a USPS blue mail collection box located on the street or in front of a post office. Criminals typically use one (1) of three (3) methods to steal these checks from USPS blue mail collection boxes. The first method is the use of a stolen proprietary USPS key which opens these boxes, commonly referred to as an "Arrow Key." These Arrow Keys are only used by the USPS and it is a federal offense for an unauthorized person to possess one. The second method is by picking the lock, either using a counterfeit Arrow Key or other burglary tools. The third method is

referred to as “fishing.” Fishing is done by placing a weighted object (typically a block or bottle) covered in a sticky substance and attached to a string into the collection slot and then pulling it out via that string with any attached envelopes. In cases where personal checks are stolen, the pen ink is often removed by criminals in a process called “washing” and then re-written into the name of a person who deposits the altered check into their checking account. Persons who engage in this deposit activity are known as money mules.

- b. Checks are commonly washed by using a chemical, specifically, acetone (nail polish remover) to wash away the pen ink used to write information on a check without damaging the check or its higher quality ink. Other methods include using razor blades or erasers to remove the ink, although these methods will typically damage the check more than an effectively executed chemical washing. The criminal will then add unauthorized information on the check so it can be deposited into a money mule’s account. This is be done by hand or via printer. Sometimes the check’s information will also be saved (either in a ledger, electronic device, or electronic storage media) to enable the creation of counterfeit checks which are printed using a computer, printer and blank check stock.
- c. Once the check has been washed and re-written, the recruiter will co-ordinate with the mule to have the check placed into the mule’s account. If the forgery is not detected by the bank and funds are credited to the mule’s account, the money is then removed from the bank account via transfer, purchases, or cash withdrawals before the check’s alteration is noticed, the bank alerted, and the charges reversed. Business checks are often altered in a similar manner, however sometimes the depositor will



instead falsely endorse the check to his/herself without altering the checks face.

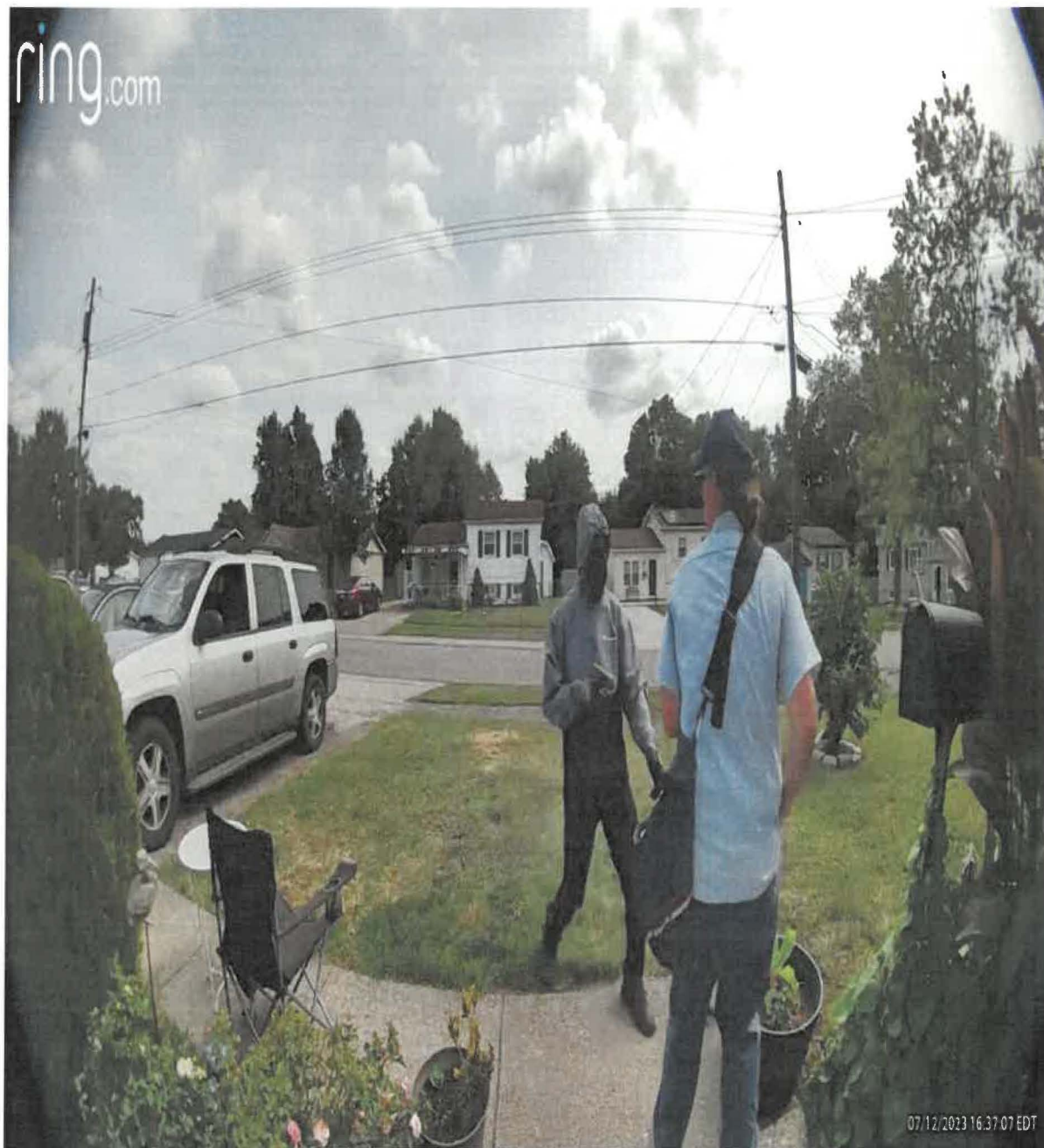
Money mules and those they work for often use mobile deposits for these checks, because it is believed the computers that approve checks deposited by mobile application are less likely to detect alteration than a person. The person who recruits money mules into the schemes are referred to as recruiters.

- d. Individuals involved in check fraud, credit card theft, credit card fraud and identity theft offenses frequently keep evidence associated with their activities in their residences, vehicles, and places of business. These can include records of items improperly taken and/or received, records of transactions, information identifying victims, accomplices or co-conspirators, and records listing and/or identifying the nature and location of the proceeds of unlawful activity. They will also store materials in multiple locations and maintain multiple residential and/or business addresses and/or vehicles to avoid discovery and apprehension.
- e. Based on my training and experience, individuals engaged in these offenses often possess and/or maintain firearms, stolen checks, materials discarded from stolen mail, check-washing substances, proceeds of the fraud in their vehicles and at their residence(s).

**The July 12, 2023 Assault of a Postal Carrier**

7. On July 12, 2023, at approximately 4:37PM, a USPS Letter Carrier was delivering mail (on foot) near 3240 Cliffside Drive, Cincinnati, OH 45251. An unknown male subject approached the Letter Carrier, displayed a firearm and demanded the Letter Carrier's keys. The Letter Carrier complied and handed over her USPS Arrow Key and USPS Vehicle keys. The suspect then fled the area on foot. The victim described and the video of the robbery

showed the suspect to be a short, skinny, black male wearing a half gray and half black hoodie, sunglasses, gloves, and a black mask. A photograph of the robbery is below:





8. Video surveillance was obtained from a residence on Anaheim Court, south of the robbery on Cliffside, and showed the suspect walking up the street shortly after the robbery heading north and cutting between homes. A photograph from the video is below:



9. On July 13, 2023, Inspectors canvassed the area north of Anaheim Court. Inspectors found video surveillance cameras on Gibraltar Drive and contacted the residents. One resident did have video of the suspect cutting through yards and walking north along Gibraltar Drive. The suspect had removed the gray and black hoodie and was carrying the hoodie in his hand. The suspect was wearing a white t-shirt at that time.







10. The suspect then turned right into the driveway of 9638 Gibraltar Drive, Cincinnati, OH 45251 (hereinafter PREMISES 1) and disappeared on the side of the residence where the driveway goes behind the house. Photos from the video are below:

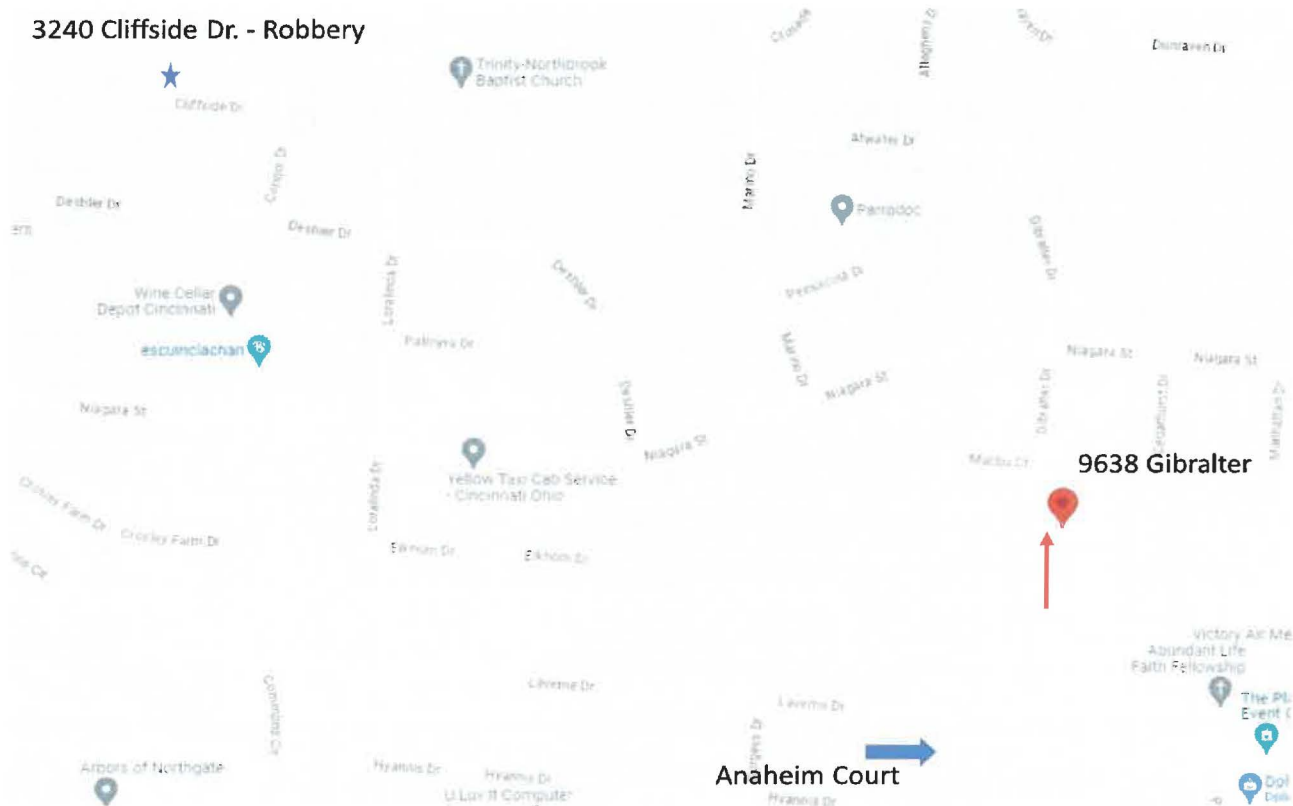




11. PREMISES 1 has a chain-link fence surrounding the property and the suspect walked directly through the opening of the driveway into the fenced property. The video shows that the suspect passed several houses on the right hand-side and then turned deliberately through the fence opening and onto the driveway at PREMISES 1.



12. The map below shows the relative location of the scene of the robbery on Cliffside Drive as compared to the video on Anaheim Court and the PREMISES 1, the house on Gibraltar. As noted on the map, the robbery occurred at 3240 Cliffside. The suspect then appeared on video traveling northbound on Anaheim Court with the jacket on. The suspect then appeared on video (with the jacket off) as entering Gibraltar from a backyard at the southernmost cul-de-sac on the street. The suspect proceeded northward up Gibraltar for several houses (shown by the red arrow), before turning right into the driveway at 9638 Gibraltar. Accordingly, it is reasonable to conclude that the suspect headed south past Gibraltar, then doubled back without the jacket to proceed to a specific location on Gibraltar.



13. On July 17, 2023, Inspector Brad Dorman received a tip from a resident on Gibraltar Drive. The resident viewed the security video described above and reported that they have seen an individual matching the robbery suspect's description frequent PREMISES 1 (9638 Gibraltar Drive). The resident said the individual is black, short and skinny and drives a Black Dodge Charger with OH Tag JXD2791, hereinafter the VEHICLE.

14. Inspectors found that the VEHICLE is registered to Alisha Glenn, 10219 Storm Dr, Cincinnati, OH 45251 (hereinafter PREMISES 2). A search through databases and from local police agencies, it was found that Alisha Glenn has a son, Lamarion Deshon Gray. Law enforcement records show that Gray is approximately 5'2" – 5'4" in height and approximately 100 - 125lbs. This is consistent with the size of the suspect. It was also found through public records that Gray was involved in a traffic crash on October 11, 2022, while driving the VEHICLE.

15. A search of Gray through CLEAR and OHLEG shows Gray to reside with his mother, Alisha Glenn, at PREMISES 2.<sup>1</sup>

16. On July 20, 2023, at approximately 4:00AM, Inspectors observed the VEHICLE parked in the driveway of PREMISES 1.

17. On July 21, 2023, at approximately 3:30PM, Inspectors observed the VEHICLE parked on the street in front of PREMISES 2 and a short black male working on lawn equipment in the garage.

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<sup>1</sup> CLEAR is a law enforcement database that is used as a tool for investigations to identify person/business address information. OHLEG is the State of Ohio Law Enforcement Gateway used to gather information from driver license and vehicle registration documents.

18. On July 24, 2023, at approximately 8:15AM, Inspectors observed the VEHICLE parked on the street across from PREMISES 1.

19. Law enforcement obtained a warrant that authorized the placement of a GPS tracker on the VEHICLE. GPS tracking of the VEHICLE further confirmed that it traveled to PREMISES 1 and PREMISES 2 often, including multiple times per day, in the period between July 28, 2023 and August 16, 2023.

20. USPIS obtained search warrants through the U.S. District Court for the Southern District of Ohio for PREMISES 1, PREMISES 2, and the VEHICLE.

21. On August 21, 2023, USPIS Inspectors executed the search warrants for PREMISES 1, PREMISES 2, and the VEHICLE.

22. Within the VEHICLE, Inspectors found the following:

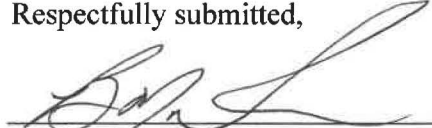
- a. A gold-colored barrel for a handgun, that is consistent with the color of the firearm used in the July 12, 2023 robbery. The handle of the firearm was recovered from PREMISES 2.
- b. A stolen USPS arrow key. The serial number for the arrow key had been scratched out.
- c. A set of USPS Vehicle keys. USPS records confirm that the vehicle key tag matched the vehicle used by the postal carrier who was robbed on July 12, 2023.
- d. A pair of gray and black gloves that are consistent with the gloves used during the July 12, 2023 robbery. The USPS arrow key and vehicle keys were found rolled inside of the gloves.



e. Numerous checks and articles of mail that had not yet been processed by the U.S. mail, which is indicative of mail that has been stolen from U.S. mail collection boxes.

23. Your affiant believes that there is probable cause to establish that LAMARION GRAY attempted and committed the offenses of 18 U.S.C. § 1704 (theft of mail key), 18 U.S.C. § 1708 (Theft of Mail Matter Generally), 18 U.S.C. § 2114(a) (Robbery of U.S. Property with Dangerous Weapon), and 18 U.S.C. § 924(1)(A) (Use of Firearm During and in Relation to a Crime of Violence).

Respectfully submitted,



Brad Dorman  
Postal Inspector  
United States Postal Investigation Service

Subscribed and sworn to before me  
on August 21, 2023:

  
HONORABLE KAREN L. LITKOVITZ  
UNITED STATES MAGISTRATE JUDGE